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18 UNITED STATES DISTRICT COURT  
19 NORTHERN DISTRICT OF CALIFORNIA  
20 SAN FRANCISCO DIVISION

21 HUI MA, AILING ZHAO, XI LIU,  
22 YIXUAN WANG, and RUI ZHANG,

23 Plaintiffs,

24 v.

25 GOLDEN STATE RENAISSANCE  
26 VENTURES, LLC, *dba* Golden Gate  
27 Global, a California Limited Liability  
28 Company; GSRV MANAGEMENT, LLC,  
a California Limited Liability Company;  
GSRV-VTI MANAGEMENT, LLC, a  
California Limited Liability Company;  
ERIC CHELINI, an individual; STEVEN  
KAY, an individual; and VERTEBRAL  
TECHNOLOGIES, INC., a Minnesota  
corporation,

Defendants.

Case No. 3:21-cv-00856-WHO

**DECLARATION OF XI LIU IN  
SUPPORT OF PLAINTIFFS'  
OPPOSITION TO DEFENDANTS'  
MOTIONS TO COMPEL  
ARBITRATION**

Complaint filed: Feb. 3, 2021

Date: May 26, 2021  
Time: 2 p.m.  
Courtroom: Courtroom 2, 17th fl.  
Judge: Hon. William H. Orrick

**DECLARATION OF PLAINTIFF XI LIU**

1  
2  
3 1. My name is Xi Liu. I am one of the Plaintiffs in this action.

4 我的姓名是刘茜。我是本诉讼的原告之一。

5  
6 2. I am a Chinese national.

7 我是中国公民。

8  
9 3. I live in China.

10 我住在中国。

11  
12 4. My native language is Chinese.

13 我的母语是中文。

14  
15 5. I have very limited English proficiency.

16 我的英语水平非常有限。

17  
18 6. In applying to the EB-5 Program and investing in the GSRV-VTI Project, I used  
19 and relied on the services of an immigration agency, Strong Union Consulting Ltd./Shurui Gao  
20 (“the Agency”).

21 在申请 EB-5 投资移民并投资 GSRV-VTI 项目时，我使用并依赖了来自移民代理机  
22 构 Strong Union Consulting Ltd./Shurui Gao (“代理机构”) 的服务。

23  
24 7. I received every document that I was asked to sign about the GSRV-VTI Project  
25 from the Agency, via email.

26 我通过电子邮件收到了来自代理机构的要求我签署的所有 GSRV-VTI 项目相关文件。

1           8.     I did not receive any contract documents directly from any of the named  
2 Defendants.

3           我没有直接从任何一位被告处收到过任何合同文件。  
4

5           9.     The English version of the Subscription Agreement for GSRV-VTI II, LLC  
6 (“**Subscription Agreement**”) is the only complete contract that I received and was told to sign.  
7           英文版 GSRV-VTI II, LLC 认购协议（《**认购协议**》）是我所收到并被告知签署的  
8           唯一完整的合同。  
9

10          10.    I did not receive a complete translation of the Subscription Agreement in Chinese.  
11 But the Agency sent me what I understood to be a detailed summary, in Chinese, of the  
12 subscription agreement's most important points.

13          我没有收到《认购协议》的完整中文译本。但是，我从代理机构处收到了我认为详  
14          细总结了认购协议要点的中文译本。  
15

16          11.    I did not receive a translation for any other supposed agreements between the  
17 Defendants and me.

18          我没有收到其它任何被告与我之间假定协议的中文译本。  
19

20          12.    Separately, the Agency also sent me several signature pages, with instructions on  
21 how to fill them out.

22          另外，代理机构还给我发了几张签名页，其中包括如何填写签名页的说明。  
23

24          13.    Even after I signed the Subscription Agreement, I was not sent or asked to review  
25 a copy of the Operating Agreement for GSRV-VTI II, LLC attached as Exhibit G to Mr. Chelini's  
26 declaration (“**Defendants' Exhibit G**”).  
27  
28



1 即使在我签署了《认购协议》后，我也没有收到或被要求审阅 GSRV-VTI II, LLC  
2 的运营协议，详见 Chelini 先生的宣言附录 G（“被告文件附录 G”）。

3  
4 14. I do not recognize the contents of Defendants' Exhibit G. As best I can tell, I have  
5 never seen this document before.

6 我不知道被告文件附录 G 的内容。我可以说的是，我从未见过此文件。

7  
8 15. I was not given a copy of the Operating Agreement for GSRV-VTI II, LLC before  
9 I signed the Subscription Agreement.

10 在签署《认购协议》之前，我并没有收到 GSRV-VTI II, LLC 的运营协议副本。

11  
12 16. I do not recall signing the Operating Agreement for GSRV-VTI II, LLC.

13 我不记得我签署过 GSRV-VTI II, LLC 的运营协议。

14  
15 17. I did not know that the Operating Agreement for GSRV-VTI II, LLC contains a  
16 supposed arbitration agreement.

17 我并不知道 GSRV-VTI II, LLC 的运营协议还包含了一个假定的仲裁协议。

18  
19 18. I was never told about any “arbitration agreement.”

20 我从来没有被告知有“仲裁协议”。

21  
22 19. I did not intend to agree to arbitrate any dispute in connection with my investment  
23 in the GSRV-VTI Project.

24 我无意同意就我对 GSRV-VTI 项目投资相关的任何争议进行仲裁。

25  
26 20. I did not expect that any agreement between me and any Defendant might contain  
27 an agreement to arbitrate disputes in connection with my investment in the GSRV-VTI Project.

1 我没有想到我与任何一位被告之间的任何协议可能包含了我对 GSRV-VTI 项目的投  
2 资相关的争议进行仲裁的协议。

3  
4 21. My contract with the immigration agency does not contain an arbitration  
5 agreement.

6 我与移民代理机构的合同并不包含仲裁协议。

7  
8 22. I am not familiar with the U.S. judicial system.  
9 我对美国的司法系统并不熟悉。

10  
11 23. I am not familiar with the "American Arbitration Association" ("AAA"), the AAA  
12 rules, or how those rules are different from the rules of this Court.

13 我并不熟悉“美国仲裁协会”（“AAA”），AAA 的规则，以及这些规则如何不同  
14 于本法院的规则。

15  
16  
17  
18 I declare under penalty of perjury under the law of the United States that the foregoing is  
19 true and correct. Executed at 66 Yinghua Road, Nan ning, Guangxi, China  
20 P.R.C. this 4 day of May, 2021.

21  
22 

23 LIU Xi  
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26  
27  
28

